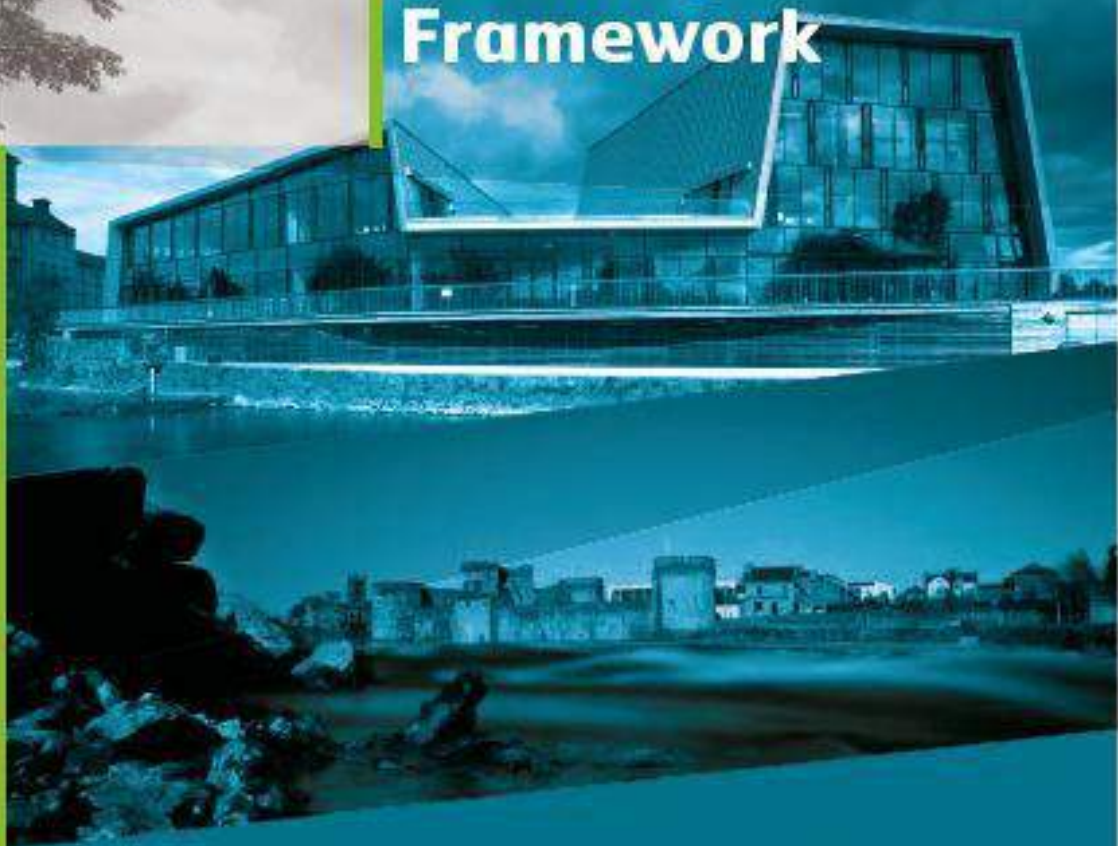
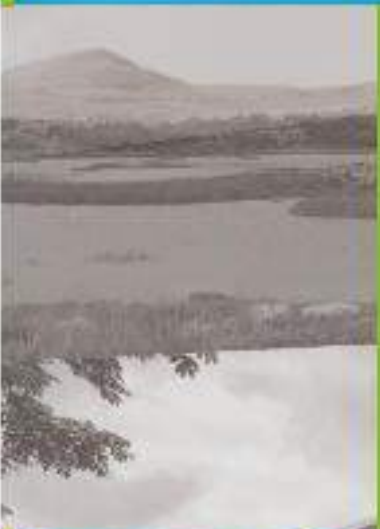


Ireland 2040 National Planning Framework



Joint submission
on behalf of:



**Joint submission by the Local Authorities of
Limerick City and County Council, Tipperary and
Clare County Council, Shannon Group, University
of Limerick, Limerick Institute of Technology,
Shannon Foynes Port Company and the Mid West
Action Plan.**

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1.0 Introduction

The Local Authorities of Limerick City and County Council, Tipperary and Clare County Councils together with our partners in Shannon Group, University of Limerick, Limerick Institute of Technology, Shannon Foynes Port Company and the Mid West Action Plan for Jobs working in collaboration welcome the opportunity to make this joint submission to the Draft National Planning Framework. Whilst the issues highlighted in the previous submission made by this group on March 16th are still applicable, this submission focuses on a number of specific concerns within the Draft Framework.

The collaborative group is disappointed that the Draft NPF does not seek to harness the potential of the Mid West Limerick City Region (MWLCR) as a driver of national growth thereby contributing to effective regional development. The framework does not seek to take advantage of the region's location at the centre of the cities of Galway and Cork, its strategic infrastructure and existing capacity for further growth, its human capital, its potential for significant population growth and the cohesiveness of the organisations working to drive the region forward.

Our collective vision to establish the Mid West Limerick City Region as a dynamic Tier 2 City Region maximizing the position of Limerick City at its centre is not reflected or acknowledged in the Draft NPF. The MWLCR can act as a focus for concentrated investment and growth at a level which can contribute towards national development, economic competitiveness and deliver on effective regional development. It is considered that a number of key positive amendments to the existing draft can provide for a National Planning Framework which fulfills the promise as set out in the Issues Book and provides for effective regional and economic development.

2.0 Mid West Limerick City Region

The Mid West Limerick City Region has enormous competitive advantages, including its central location on the Atlantic Economic corridor with over 40% of US FDI within its catchment; its national and international connectivity; national assets such as, Shannon International Airport, Shannon Estuary and Shannon Foynes Port; world class Third Level facilities including the University of Limerick, Limerick Institute of Technology, St. Patrick's College, the Garda Training College and strategic power grid infrastructure including Moneypoint, Ardnacrusha and significant renewable energy generators.

The Region also benefits from partners and stakeholders who have historically demonstrated a cohesive vision for the region building on decades of co-operation and teamwork in tackling issues and delivering results across administrative, organisational, operational and institutional barriers. The National Planning Framework must clearly articulate a clear, strategic and ambitious vision for the City Region and provide for population and economic growth of a scale that can impact nationally and internationally.

The NPFs definition of Limerick City as a regional centre, with restricted population growth targets for the Region as a whole, falls short in recognising the potential and ambition of the City Region.

Smart growth in our cities and the City Regions must go hand in hand with intercity connectivity. The notion within the NPF that regional accessibility will only be enhanced once the cities have achieved a critical mass is not practical and will only serve to limit the potential for the cities to grow. The text addressing enhanced regional accessibility must be amended to highlight that intercity connectivity is a priority within the southern region, as it connects three of the five cities within our country.

Map 1: Map illustrating Strategic Location of the Mid West Limerick City Region



3.0 Effective Regional Balance

In order for regions to contribute to the national economy the NPF needs to provide for the conditions for regions to grow and realise their full potential. The NPF itself highlights the risks of not securing an appropriate and effective regional balance in terms of Ireland’s future development. It further acknowledges that unbalanced growth, largely focused in Dublin and the surrounding region creates a significant risk, whereby not achieving the economy’s full potential will give rise to a shortfall in Ireland’s economic performance with serious and long-lasting consequences for future living standards and the quality of life overall, across all regions of the country.

However, a comparison of the apportionment of the 2016 population across the regions compared with the 2040 population targets percentage apportionments, demonstrates that the 'business as usual' approach will be the outcome if the Draft NPF is implemented as currently proposed.

Table 1: Regional population targets, trends and projections

	2016 Population	%	2040 Population	%
Eastern and Midlands	2,328,517	49%	2,800,000	48%
Northern and Western	847,442	18%	1,000,000	17%
Southern	1,585,906	33%	2,000,000	34%
Total	4,761,865	100%	5,800,000	100%

The proposal that Limerick, Waterford, Cork and Galway will have just under one-quarter of the overall population growth by 2040 while the Dublin commuter belt, including the 'Mid-Eastern Region' (Wicklow, Kildare and Meath) will consume 50% of the growth does not represent equitable nor effective regional balance. The final NPF needs to provide for stronger growth and far greater ambition in the population targets for the Southern Region, and in particular in the Mid West Limerick City Region, to provide a policy framework and critical mass to enable effective regional development and rebalancing of population.

The ESRI report published on the 26th October 2017 on "Projections of demand for healthcare in Ireland 2015 – 2030" projects an increase in population by between 14% (0.64 million) and 23% (1.08 million) from 2015 to 2030. It is advocated that the overall population growth is amended to reflect this published ESRI report and to ensure consistency in the delivery of services across government departments, as proposed in the draft NPF. This submission requests that the final NPF updates the published ESRI report and makes provision for the population growth for the period 2030 to 2040 and that this additional population is allocated to the MWLCR.

4.0 Population projections

4.1 Population growth past trends

Based on the projected population figures and apportionments set out in the Draft NPF it is estimated that the population increase for the Mid West (includes all of Tipperary) from 2016 to 2040 will be 24%. This represents only a 3% increase on the population growth for this region from 1996 to 2016. Limerick City depends on this region to provide a wider workforce and skills base and in turn the city has the potential to boost the region by promoting growth and employment. The population growth of the Mid West Limerick City region needs to be increased in order to drive the economic development of Limerick city as proposed in the framework.

4.2 Development within built up areas

The target growth of cities, towns and villages through emphasis on renewing and developing existing built up areas is welcomed. However, the uniform prescriptive use of percentages across the country does not take into account the actual capacity of each urban area to accommodate the specified target. For example the area of opportunity for infill development in areas outside the Dublin urban area is significantly smaller, therefore the 50% / 30% requirement is considered excessive. It is recommended that the emphasis on the renewal of core urban areas is retained in the NPF, however the apportionment should be allocated following an assessment of the capacity at local level rather than a uniform nationwide approach.

While it is appreciated that there is a need to avoid excessive zoning of land, it is considered that the 50% headroom proposed in terms of zoning is not sufficient and could potentially result in increased land prices and issues with land availability. Therefore it is recommended that the headroom percentage is increased.

4.3 Towns under 10,000 population

The population threshold adopted of 10,000 will undermine the role played by Towns which previously held Town Council Status and other large towns within the MWLCR and which are economic drivers within their municipal districts. These towns offer a high quality of life and strong support structure to their communities and businesses. The proposed restrictions on population growth outside the cities and large towns will negatively impact on the demise of the vibrancy and viability of these towns. The table below, which represents a top level overview of the figures, highlights that the population projections as outlined in the draft NPF represents little or no targeted growth of towns, villages and rural areas over the lifetime of the Framework.

Table 2: Proposed estimated population growth in Southern Region

Population allocation for southern region	375,000 (maximum growth figure)
3 Cities (Cork 115,000) (Limerick 52,000) (Waterford 29,000)	196,000 (allocated growth figures)
Large Towns	60,000 (16% of total)
Remaining population for small towns below 10,000 and rural areas	119,000
Distributed between 9 Counties in Southern Region (proportions to be decided by RSES)	13,222 (between 2018 and 2040)
Average annual growth in population (23 years of the NPF)	575 people pa
Houses required at annual basis (occupancy rate of 2.5)	230 houses pa

It is suggested that the NPF should take reference from the CEDRA Report “Energising Ireland’s Rural Economy” in defining large towns i.e. those above 5,000 people. NPO 7 should be amended to acknowledge this distinct category, and policy provision should be included which support large scale economic development, job creation and strong residential growth.

Moreover the proposal as set out in National Policy Objectives 9a and 9b which advocates that “**strategic employment growth** would be located in the 5 identified cities identified on Table 3.1 (Dublin, Cork, Limerick, Galway, Waterford), whereas Regional and Local Authorities will identify and quantify locations for **employment growth**, where suitable, **in urban and other areas generally**”, is of significant concern. The MWLCR contains key towns like Ennis, Nenagh and Shannon, together with the industrial areas of Shannon, Shannon International Airport and the entire Shannon Estuary, all of which have the capacity and track record to deliver strategic employment growth. Therefore Policy objectives should reflect the appropriateness of specific areas to support strategic employment growth.

5.0 Metropolitan Area Strategic Plans

The proposal in the NPF for the inclusion of Metropolitan Area Strategic Plans and their role in the development of City Regions are unclear. There must be greater clarity in relation to the proposed content, the definition of “appropriate authorities”, the timelines, together with relationship between the MASPs and the City Regions.

It is suggested that the strategic objectives for Metropolitan areas should be set out in the RSEs and should articulate how the city regions based on the Strategic Planning Areas can

support the cities. It is also requested that the City Regions around each of the five cities should be examined and not just Dublin and Cork as proposed. The boundary for these MASPs should be defined by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc as well as the commute patterns.

6.0 National Strategic Outcomes and Key Future Enablers

To facilitate the growth of the Mid West Limerick City Region and to maximum its potential, the NPF must include supporting statements within the National Strategic Outcomes and key future growth enablers. These should include the following:

- Identify the MWLCR with Limerick City at its centre, as a dynamic tier 2 European city region.
- Confirmation that the key towns of Ennis, Nenagh and Shannon lie within the Limerick City Region and are central to Limerick City realising its full potential within the NPF.
- Policy support for the Limerick Northern Distributor road, the development of which is considered critical to facilitate future economic development of the city and the region. It will benefit regional city interconnectivity, provide improved access from the region to the University of Limerick, the IDA national technology park, Shannon International Airport and the businesses and industries in the Shannon area. This will significantly enhance the attractiveness of the region from a research, innovation and development perspective.
- Shannon Airport must be recognised as a strategic international airport of national and international importance. There is a need to maximise existing spare capacity and, in line with other sectoral plans, National Aviation Policy should be aligned to reflect approach to effective regional development in the NPF.
- Shannon Airport must be recognised and promoted as an international centre for Aviation, including leasing, maintenance and training. The continued growth and development of this sector in Shannon will build on an established international reputation and can achieve significant economic growth and investment for the Country.
- The wording in relation to public transport connectivity to Shannon Airport from the wider region needs to be strengthened with clear support for direct rail connectivity to the Airport, subject to appropriate economic appraisal.
- Faster rail link between Limerick and the Dublin / Cork line to allow faster commute times.
- Whilst it is acknowledged that one of the national strategic outcomes is the enhancement of road connectivity to Shannon-Foynes Port, including local by-passes, the Framework does not provide for the growth of Shannon Foynes Port Company in the same way as it does for Dublin Port. It is therefore requested that the national strategic outcome as it relates to SFPC is amended to read as follows, *“Facilitate the growth of SFPC through greater efficiency and improved road access, including the enhancement of road connectivity, including local by-passes”*.

- The NPF needs to support the reinstatement of the Limerick to Foynes Railway line, linking Ireland's deepest port to the national rail network. SFPC has already secured €800,000 in funding to undertake a study of the potential for reinstating and expanding the rail line connecting the Port of Foynes to the Irish rail network. As well as port benefits, reinstatement of the rail line has the potential to bring added tourism and environmental benefits to the economy. Both the road and rail links are key twin element for the TEN-T requirement for Tier 1 ports and are intrinsically linked to delivering the balanced economic growth objectives as set out in the Draft NPF. With adequate support in the NPF, a potential rail connection has the real possibility of forming a central part of the 'access strategy' for the port, consistent with European and national transport policy.
- Chapter 7 sets out various National Policy Objectives, which all deal with linkage with Northern Ireland, Wales and our closest neighbours. However, there is no National Policy Objective dealing with connections to Europe and this should be included in the NPF, as follows: *"Work with the EU to ensure the early delivery of the necessary upgrade to the land based transport systems to our Tier 1 Ports and Airports to ensure faster transit time between Ireland and the EU and to promote balanced regional economic growth"*.
- The NPF should provide for clear support for the significant development of the University of Limerick and Errina Canal on the northern landbank accessed by the LNDR. The University should be supported in growing and developing alongside the Technological Campus which adjoins it. The NPF should promote innovation, research and development into new technologies and facilitating the development of the next generation of university related industries.
- The identification and support to develop Lisheen Mine (identified as a 'European Model Demonstrator Region for the Bio-Economy) as a national research and development hub for the bio-economy. The NPF should specifically identify the Mid-West Region and Shannon Estuary as a key contributor to renewable energy generation and investment in grid infrastructure should reflect same.
- Having regard to the forthcoming national policy statement on the bio-economy and its importance, it is recommended that the section on the Circular Economy section should be strengthened. The Mid West is leading in this area, and should be identified as the best practice location for the further development of the energy production, the bio-economy, rural development and the creation of jobs in this sector.
- The framework fails to recognise the importance of tourism areas to the national and regional economy and the importance of supporting the protection, enhancement and investment in these areas for generations to come. A national policy objective should be included to support International Tourism Destination Strategies and Local Tourism Companies. Strategic Areas in the Mid-West including the River Shannon, Lough Derg, Errina Canal, the Burren and Lough Gur should also be acknowledged.
- If the MWLCR is to maximise the economic and social benefits for all arising from digital transformations, to deliver innovation, business and jobs growth, it requires tier-one connectivity. Investment into our digital networks will ensure that the region has the infrastructures to capitalise on growth markets such as blockchain and Artificial Intelligence.

7.0 Summary of Recommendations

- (a) Published population projections for 2040, as evident by recent ESRI reports, are demonstrated to be too low. It is recommended that overall national targets are re-examined to reflect the most recent ESRI report and it is advocated that an increased project population is allocated to the Southern Region.
- (b) Alternatively - Population and Jobs Growth projections needs to be significantly re-distributed from the Eastern and Midlands Region to large and small towns in the Southern Region.
- (c) Recognise the role of Shannon International Airport as an aviation and employment cluster, together with Shannon Town's industrial area, as interlinked with the success of the Mid West Limerick City Region. The national aviation policy should be aligned with the objectives of the NPF, to maximise the capacity for growth and return on investment of Shannon International Airport.
- (d) In order to achieve balanced regional connectivity, critical regional infrastructure mentioned in this submission should be identified as Strategic National Outcomes and in the National Investment Plan. In particular the identification of the Limerick Northern Distributor Road (LNDR) - the route of which has been subject to SEA and HDA should be identified as a priority investment – the outcome of which will unlock significant national economic potential linking Shannon International Airport to create a northern access to UL and its landbank, and maintaining and future-proofing capacity in the inter-region road network.
- (e) The NPF should take reference from the CEDRA Report “Energising Ireland’s Rural Economy” in defining large towns i.e. those above 5,000 people. NPO 7 should be amended to acknowledge this distinct category, and policy provision should be included which supports large scale economic development, job creation and strong residential growth.
- (f) The emphasis on the renewal of core urban areas should be retained in the NPF; however the apportionment should be allocated following an assessment of the capacity at local level rather than a uniform nationwide approach.
- (g) Different Headroom for Cities, Town and Village need to be provided. For Cities, Towns and Villages the minimum headroom should be 150%.
- (h) The City Regions should be defined by establishing a clear vision for their growth and development. This is to ensure that the socio-economic characteristics of each region achieve a critical mass to an international/national status. The Metropolitan Strategic Area Plans should be developed and refined as part of the preparation of the ESES and should be a central element of these Strategies when published.

- (i) Ireland 2040: Our Plan should acknowledge that Limerick is much broader than simply their cities and suburbs and include a wider City Region which supports the development and success of the Cities.**
- (j) The text addressing enhanced regional accessibility must be amended to highlight that intercity connectivity is a priority within the southern region. The suggestion that regional accessibility will only be enhanced once the cities have achieved a critical mass is not practical and will only serve to limit the potential for the cities to grow.**
- (k) The NPF should recognise tourism as a nationally important economic driver, and spatially identify and support the development of Fáilte Ireland's tourism destination propositions, including the 'Lakelands Area'.**
- (l) The NPF should maximise the potential for renewable energy generation in the Region and the Shannon Estuary, by reinforcing and investing in the transmission infrastructure in the region to facilitate the transfer of renewable energy to the major demand centres.**

8.0 Conclusion

The draft National Planning Framework as published will perpetuate the existing economic imbalance across the island.

It is clear that the Mid West Limerick City Region has the capacity for significant investment and population growth given its strategic location as a centre of excellence and innovation, at a centre-point between Galway and Cork cities. The MWLCR has the potential to maximise the economic and social investment for the greatest benefit of surrounding centres of population in the west and south west. This will ensure that limited state financial resources achieve the greatest value for money while benefiting the largest number of people.

The development of a Mid West Limerick City region to a dynamic tier 2 European city of scale that can impact nationally and internationally is imperative if the NPF is to deliver for the nation. Therefore the National Planning Framework must articulate a clear, strategic and ambitious vision for the Mid West Limerick City Region supported by an increase in the projected population growth together with strategic infrastructural, economic and social investment.

